

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
"BOB" MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S), JANE DOE(S),
DELAWARE and OTHER LAW FIRMS
representing and acting in concert with John
Doe(s) and/or Jane Doe(s), INVESTMENT
BANKS employed by John Doe(s) and/or Jane
Doe(s), PATRIC THEUNE, and SEECUBIC
B.V.,

Defendants.

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**REVISED WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS' MOTION
FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND
PERMANENT INJUNCTION**

The above captioned Debtors, Debtors in Possession, and Plaintiffs, (“Debtors”) submit this revised witness and exhibit list for the hearing scheduled for **November 27, 2023, at 10:30 a.m. (ET)** (“Hearing”) before the Honorable Magdeline D. Coleman, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, located at 900 Market Street, Suite 203, Philadelphia, Pennsylvania, 19807.

WITNESSES

The Debtors designate the following persons as witnesses who may be called at the Hearing:

1. Mathu Rajan, Founder and CEO of StreamTv
2. Shadron Stastney, Executive Chairman of SeeCubic, Inc.
3. Charles Robertson, former officer of StreamTv
4. Chris Michaels, President and CEO of Brown & Michaels, PC

The Debtors also cross-designate all witnesses designated by any other party in connection with the Hearing, and reserve the right to call any necessary rebuttal or impeachment witnesses, including, but not limited to Klaus Banerjee.

EXHIBITS

The Debtors designate the following exhibits that may be used at the Hearing:

Exhibit No.	Description
1	Philips License
2	Rembrandt License
3	License Covenant

4	SeeCubic Subscription Agreement
5	SeeCubic 2022 Private Placement Memorandum
6	SeeCubic 2020 Private Placement Memorandum
7	Stastney Deposition Transcript
8	Declaration of Mathu Rajan
9	Declaration of Charles Robertson
10	<i>SI Handling Sys. v. Heisley</i> , 753 F.2d 1244, 1264 (3d Cir. 1985)
11	<i>Par Pharm., Inc. v. Quva Pharma, Inc.</i> , 764 F. App'x 273, 279-80 (3d Cir. 2019)
12	<i>BP Chems. Ltd. v. Formosa Chem. & Fibre Corp.</i> , 229 F.3d 254, 263 (3d Cir. 2000)
13	<i>Ilapak, Inc. v. Young</i> , 2020 U.S. Dist. LEXIS 94550, at *15-17 (E.D. Pa. May 29, 2020)
14	<i>Middle E. Forum v. Reynolds-Barbounis</i> , 2021 U.S. Dist. LEXIS 4350, at *17 (E.D. Pa. Jan. 8, 2021)
15	<i>Razor Tech., LLC v. Hendrickson</i> , 2018 U.S. Dist. LEXIS 74918, at *29 (E.D. Pa. May 3, 2018)
16	<i>N. Am. Dental Mgmt., LLC v. Phillips</i> , 2023 U.S. Dist. LEXIS 122070 (W.D. Pa. July 14, 2023)
17	<i>Cont'l Grp., Inc. v. Amoco Chems. Corp.</i> , 614 F.2d 351 (3d Cir. 1980)
18	<i>Ritescreen Co., LLC v. White</i> , 2023 U.S. Dist. LEXIS 140983 (M.D. Pa. Aug. 11, 2023)
19	<i>Advanced Fluid Sys. v. Huber</i> , 958 F.3d 168 (3d Cir. 2020)
20	<i>In re StreamTv</i> June 27, 2023 Hearing Transcript
21	StreamTv TRO Power Point
22	<i>In re StreamTv</i> April 14, 2023 Hearing Transcript
23	<i>In re StreamTv</i> June 29, 2023 Hearing Transcript
24	SeeCubic et al September 12, 2023 Dutch Claim Amendment
25	Stastney SEC Violation Order
26	Morton Cold Shoulder

27	Stastney Employment Agreement
28	Google Purchase Order
29	Roughly Email
30	Banerjee Email
31	Google Inbound Services Agreement
32	Delaware Supreme Court En Banc Opinion
33	Delaware Supreme Court Mandate
34	Chancery Court TRO Granted to Stream
35	Chancery Court Partial Final Judgment per Rule 54(b)
36	Chancery Court Order Regarding Motion for Mandatory Injunction Final
37	Chancery Court Opinion on Emergency Motion to Enforce
38	SCI Email to Shareholders re CES
39	Hearing Transcript-Highlighted
40	Damvelt Email 1
41	Damvelt Email 2
42	SCI Website
43	Stream Website
44	Hawk Proof of Claim
45	SLS Proof of Claim
46	SeeCubic Inc Proof of Claim
47	Stastney Resolution (Release)
48	BOE Cooperation Agreement
49	Padillia Ruling

50	VSI Purchase Order 1 March 20, 2023
51	VSI Purchase Order 2 April 11, 2023
52	Cystar Purchase Order
53	Southern Telecom Purchase Order
54	SeeCubic BV-Stream Note
55	Ultra D-Stream Note 1 December 2012
56	Ultra D-Stream Note 2 December 2016
57	Arstechnica News Article
58	Huff Post Article
59	CES MTV Article
60	SeeCubic Website as of 10-27-2023
61	Excerpts Stream TRO Hearing Transcript from October 16, 2023 RE Hawk and Morton Connection
62	Court of Chancery 08.10.22 Order Granting Final Judgment Rule 54(b) Highlighted
63	Telephonic Oral Argument in Hawk v. Stream Transcript RE Morton Controls Hawk
64	Excerpts from Oral Argument in Court of Chancery Zoom Hearing Stream SeeCubic RE SQO & MTE Transcript Highlighted
65	Court of Chancery Proposed Order with Laster Comments Highlighted
66	Philips License Amendment (as separate file)
67	AVS Forum Article
68	SeeCubic's Supplemental Brief in Opposition Highlighted
69	Informal Discovery from the Receiver
70	Transcript from October 16, 2023 TRO Hearing
71	SeeCubic 10-18-2023 Trademark Application
72	SeeCubic 2/16/2022 Trademark Assignment

73	SeeCube Trademark/Service Mark Statement of Use
74	Hawk Trademark Assignment 6/15/2022 Trademark
75	USPTO Trademark Assignment Abstract of Title
76	Declaration of Christopher A. Michaels
77	SeeCubic Trademark Filing With Stream Website Screenshot
78	Stastney Signed USPTO SeeCubic Mark Application 5/26/2022
79	SeeCube Trademark Status November 14, 2023
80	USPTO – SeeCube Trademark Register (in commerce 9-30-2016)
81	September 18, 2022 Declaration of S. Blumenthal
82	August 18, 2017 Declaration of S. Blumenthal
83	January 20, 2010 email from B. Barenbrug to S. Blumenthal
84	February 6, 2017 Declaration of B. Barenbrug
85	Non-Disclosure and Non-Circumvention Agreement
86	Motion to Intervene
87	Rembrandt’s Legal Brief in Support of Its Motion to Intervene

The Debtors also cross designate all exhibits designated by any other party in connection with the Hearing and reserve the right to use additional exhibits for rebuttal or impeachment purposes.

The Debtors reserve the right to amend or supplement this witness and exhibit list prior to the Hearing.

The Debtors reserve the right to use for any purpose any filings on the dockets or in the records of both this adversary proceeding and the main bankruptcy case.

Dated: November 25, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena
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